

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-
GBL-BMK

**DECLARATION OF RYAN SPEAR IN SUPPORT OF PLAINTIFFS’
MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

I, Ryan Spear, swear under penalty of perjury that the following is true and correct.

1. I am a counsel with the law firm of Perkins Coie LLP in Seattle, Washington.

I am one of the attorneys representing the Plaintiffs in this matter.

2. On April 8, 2015 and again on April 13, 2015, counsel for Plaintiffs and counsel for Intervenor-Defendants met and conferred via telephone in an attempt to resolve their disputes regarding Intervenor-Defendants’ claims of privilege.

3. Attached as Exhibit A is an excerpt of a true and correct copy of a transcript of a February 24, 2015 hearing before this Court in this matter.

4. Attached as Exhibit B is a true and correct copy of Plaintiffs' First Requests for Production of Documents to Intervenor-Defendants, dated March 5, 2015.

5. Attached as Exhibit C is a true and correct copy of Intervenor-Defendants' privilege log, dated March 26, 2015.

6. Attached as Exhibit D is a true and correct copy of Intervenor-Defendants' supplemental privilege log, dated April 10, 2015.

7. Attached as Exhibit E is a true and correct copy of a joint letter from Plaintiffs' counsel and Intervenor-Defendants' counsel to delegates of the Virginia House of Delegates. The joint letter was sent by Intervenor-Defendants to 29 delegates whose communications Intervenor-Defendants have withheld on legislative privilege grounds.

8. Attached as Exhibit F is a true and correct copy of the written responses received by Plaintiffs' counsel in response to the joint letter attached as Exhibit E.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief and that this declaration was executed on the 13th day of April, 2015, in Seattle, Washington.

DATED: April 13, 2015

/s/ Ryan Spear

Ryan Spear